

**Environmental
Resources
Management**

1277 Treat Boulevard
Suite 500
Walnut Creek, CA 94597
(925) 946-0455
(925) 946-9968 (fax)
www.erm.com

13 May 2014

Ms. Cynthia Ruelas
United States Environmental Protection Agency Region
Region 9
75 Hawthorne Street
San Francisco, CA 94105



Subject: Utility Port Closure Request
United Airlines, Inc.
San Francisco Maintenance Center, San Francisco International Airport

Dear Ms. Ruelas:

On behalf of United Airlines, Inc. (United), ERM-West, Inc. (ERM) has prepared this Closure Request for Floor-level Utility Ports in Buildings 10 at the San Francisco Maintenance Center (SFMC), San Francisco International Airport (SFO), San Francisco, California (Figure 1). In the summer of 2013, United conducted cleanup and additional assessment of the potential presence of Polychlorinated Biphenyls (PCBs) at the SFMC in response to limited, historical detections of PCBs in building floor drains. These remedial actions were completed in accordance with United's risk-based approval application for PCB remediation (Revised Workplan for Polychlorinated Biphenyls Investigation, Risk-Based Screening, and Remedial Action for Buildings 10 and 15 (Workplan, ERM 2013)) submitted to and approved by the United States Environmental Protection Agency Region 9 (USEPA) pursuant to 40 CFR 761.61(c). Results of the cleanup and investigation for PCBs at Buildings 10 and 15 appear in the *Cleanup Completion Report Buildings 10 and 15* (Report, ERM 2014). By letter dated 26 February 2014, USEPA approved the cleanup and assessment work in Building 10 and 15, but requested a follow up letter proposal for the completion of the closure of the former floor level utility ports in Building 10.

Purpose

The purpose of this letter is to provide USEPA with the requested closure plan for the Building 10 utility ports as requested by the Agency in its PCB remediation approval letter. This proposed plan documents the agreement

reached by USEPA and United on the nature and scope of remedial work required to complete the satisfactory closure of these utility ports.

Background

Three clusters of six utility ports are located in the floor in the original hangar portion of Building 10. The utility ports are approximately six inches in diameter and four inches deep, and formerly served to house water, electrical, and air utility connections for aircraft maintenance operations. Since 1967, there have been no aircraft maintenance operations in Building 10. The utility ports are restricted with lids, inaccessible, and not in use. The building now consists of a closed (non-operational) tire shop, and a parts laydown area for temporary storage.

Wipe samples were collected at each of the 18 former utility ports to confirm that cleaning of the subsurface ports was complete (Figure 2). PCBs were detected at normalized concentrations ranging from 4.4 to 35 $\mu\text{g}/100\text{ cm}^2$. As discussed with and agreed by USEPA, the data support in-place closure and sealing of the former utility ports.

Scope of Work

The proposed closure method for the utility ports is in-place abandonment. The key activities to conduct closure include filling the utility ports with Portland Cement and finishing the surface to establish grade, flush with the existing concrete floor surface. Details of the closure method are described below.

Field Preparation

Prior to performing utility port closure, the following tasks will be completed:

- Obtain a permit from the San Francisco International Airport Building Inspection and Code Enforcement department;
- Mark the vicinity of the utility ports and notify Underground Services Alert, a notification service for marking underground utilities on public rights-of-way;
- Confirm with United personnel and through a review of facility records that utility ports are properly terminated and disconnected from any active use; and
- Clear the locations with a private utility locating subcontractor.

Utility Port Closure

The utility ports will be closed by backfilling the ports with a neat mixture of 5,000 psi concrete to the existing floor surface. Two of the 18 utility ports were previously closed by United using this method, and are filled to just below the surface. These two ports will be similarly finished to the surface, with the remaining 16 utility ports.

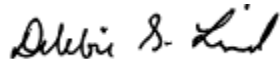
Final Report and Documentation

Upon completion of the proposed closure activities, United will prepare a report documenting the work for review and approval of USEPA consistent with the Agency's 26 February 2014 approval letter and its risk based approval authority under 40 CFR 761.61(c).

Closing

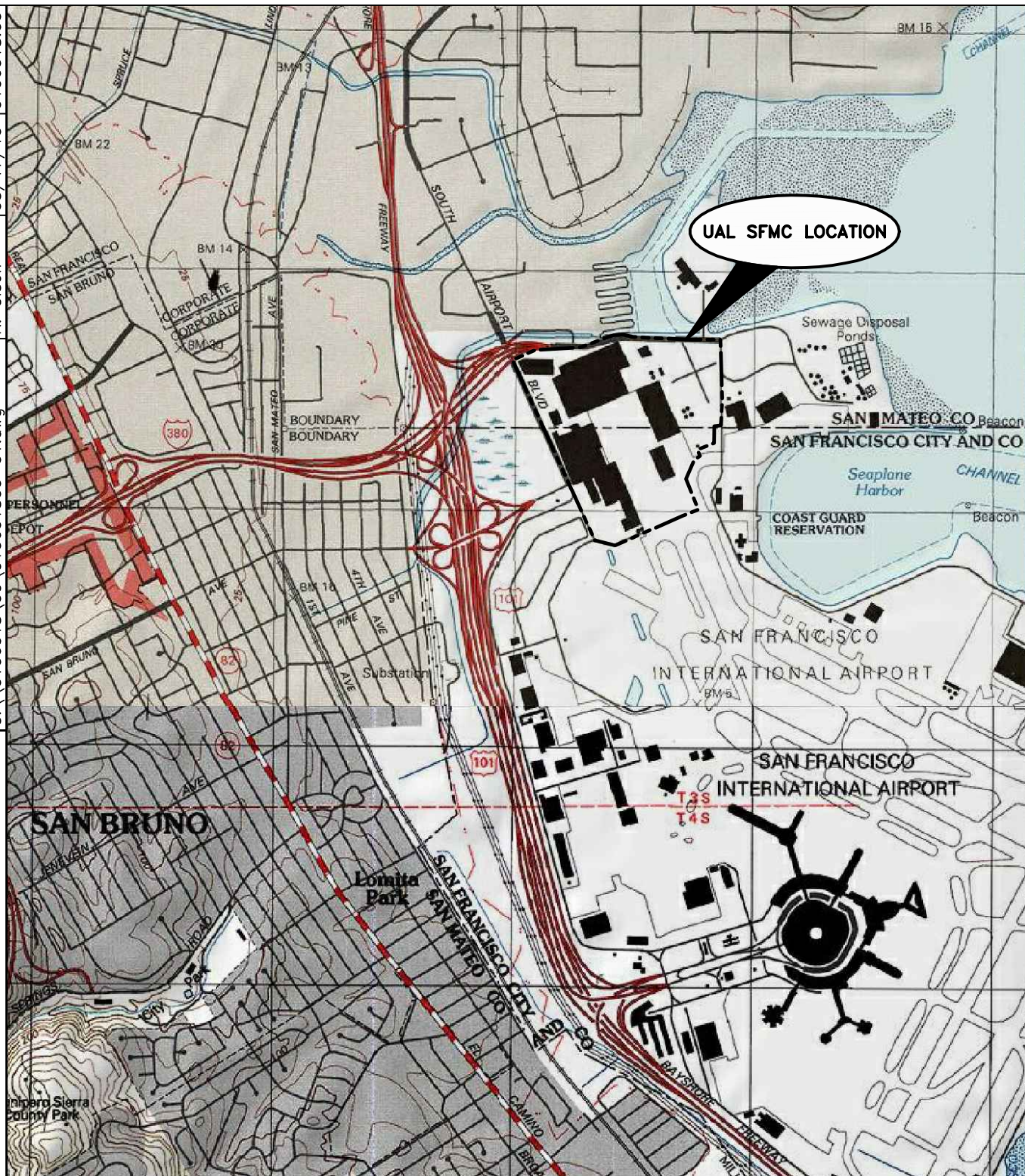
United appreciates your review of this request and looks forward to completing the work. United and ERM are available for a conference call to discuss any questions or comments.

Sincerely,

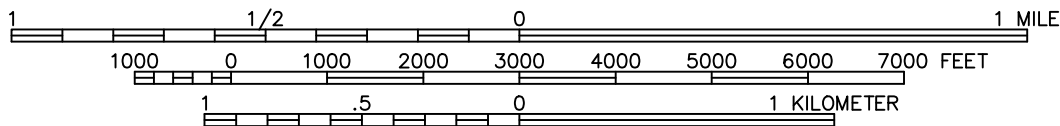
A handwritten signature in black ink, appearing to read "Debbie S. Lind". The signature is fluid and cursive, with a distinct dot over the 'i' in "Lind".

Debbie Lind, P.G.
Partner

Project No. 0106018.00
 Date: 05/17/10
 Drawn By: R. Olson
 CAD File: C:\0106018\00\010601800-01.dwg



SCALE 1: 24,000



References:

U.S.G.S. 7.5 Minute Series (Topographic San Francisco
 South and Montara Mountain Quadrangle, California)
 Dated: 1956; Photorevised 1980
 Dated: 1993

Figure 1
 Site Location Map
 San Francisco Maintenance Center
 United Airlines

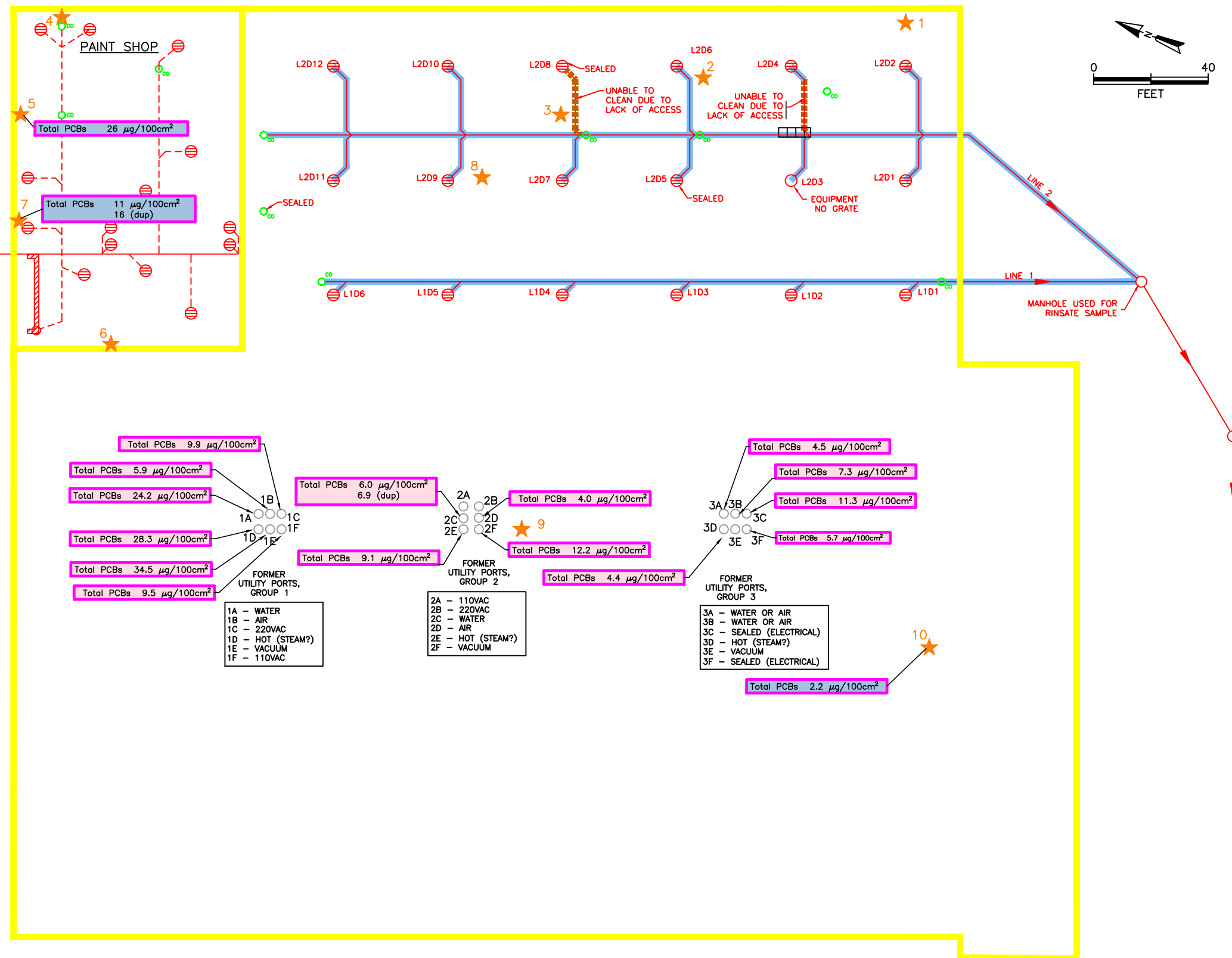


Figure 2
 Building 10 Post Remediation
 Samples Above Screening Levels
 Maintenance Operations Center
 San Francisco International Airport